



## Notice of Service of Process

Transmittal Number: 16796726  
Date Processed: 06/22/2017

**Primary Contact:** Alexandra Anable  
Family Dollar Stores, Inc.  
10401 Monroe Road  
Matthews, NC 28105-5349

**Electronic copy provided to:** Patti Ferry  
Stephanie Zedek  
Cynthia Bertucci

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<b>Entity:</b>	Family Dollar Stores Of Massachusetts, LLC Entity ID Number 3697590
<b>Entity Served:</b>	Family Dollar Stores of Massachusetts, LLC.
<b>Title of Action:</b>	Ramona Santiago vs. Family Dollar Stores of Massachusetts, LLC.
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Middlesex County Superior Court, Massachusetts
<b>Case/Reference No:</b>	1718CV01529
<b>Jurisdiction Served:</b>	Massachusetts
<b>Date Served on CSC:</b>	06/21/2017
<b>Answer or Appearance Due:</b>	20 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Personal Service
<b>Sender Information:</b>	Richard A. Lalime 978-452-4600

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC  
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED: —  
TORT — MOTOR VEHICLE TORT — CONTRACT —  
EQUITABLE RELIEF — OTHER

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT  
DEPARTMENT  
OF THE  
TRIAL COURT  
CIVIL ACTION  
No. 1781CV01529

MIDDLESEX

....., ss



RAMONA SANTIAGO  
....., Plaintiff(s)

v.

FAMILY DOLLAR STORES OF  
MASSACHUSETTS, LLC.  
....., Defendant(s)

SUMMONS

To the above-named Defendant: Family Dollar Stores of Massachusetts, LLC.

You are hereby summoned and required to serve upon Richard A. Lalime, Law Offices of Richard A. Lalime plaintiff's attorney, whose address is 144 Merrimack Street STE 444, Lowell, MA 01852 an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Lowell either before service upon plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esquire, at Lowell  
the 19th day of MAY  
in the year of our Lord two thousand seventeen

A true copy Attest:  
6/25/17 Deputy Sheriff Suffolk County

*[Signature]*  
Clerk

NOTES.

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure.
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

**PROOF OF SERVICE OF PROCESS**

I hereby certify and return that on .....  
20....., I served a copy of the within summons, together with a copy of the complaint in this action,  
upon the within-named defendant, in the following manner (See Mass. R. Civ. P. 4 (d) (1-5)):

.....  
.....  
.....  
.....

Dated: ....., 20.....

**N.B. TO PROCESS SERVER:**

**PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX  
ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.**

( ..... )

( ..... 20..... )

( ..... )

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT  
DEPARTMENT  
OF THE  
TRIAL COURT  
CIVIL ACTION  
No. 1781 CV01529

RAMONA SANTIAGO

....., Plff.

v.

FAMILY DOLLAR STORES OF MASSACHUSETTS, LLC.  
....., Deft.

SUMMONS  
(Mass. R. Civ. P. 4)

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO.:

RAMONA SANTIAGO, )  
Plaintiff )  
v. )  
FAMILY DOLLAR STORES )  
OF MASSACHUSETTS, LLC. )  
Defendant )

COMPLAINT

THE PARTIES

1. Plaintiff, Ramona Santiago, is an individual residing at 927 Dekalb Avenue, Brooklyn, New York.
2. Defendant, Family Dollar Stores of Massachusetts, LLC. is a limited liability corporation, with a principal place of business at 500 Volvo Parkway, Chesapeake, Virginia.

COUNT I

3. Plaintiff realleges paragraphs one and two and by reference makes them part of this count.
4. On or about June 3, 2014, Plaintiff, Ramona Santiago, was lawfully on the premises located at 125 Church Street, Lowell, Middlesex County, Massachusetts, exercising due care for her own safety.
5. At all relevant times hereto, Family Dollar Stores of Massachusetts, LLC. was the property owner and/or in control of the premises located at 125 Church Street, Lowell, Middlesex County, Massachusetts.
6. Defendant, Family Dollar Stores of Massachusetts, LLC. had a duty to ensure that said premises were maintained in a safe and reasonable manner.
7. Defendant, Family Dollar Stores of Massachusetts, LLC. breached said duty in that an unsafe and dangerous condition was permitted to exist, to wit: a slippery gel like substance on the floor, left unmarked and untreated; posing a threat to the health and safety of persons on the premises.
8. Defendant, Family Dollar Stores of Massachusetts, LLC. knew or should have known of the above-described dangerous condition and failed to warn the Plaintiff of said dangerous condition.
9. As a direct result of the aforementioned breach on the part of the Defendant, Plaintiff, Ramona Santiago was caused to slip and fall.

10. As a result of said slip and fall, Plaintiff, Ramona Santiago was severely injured, suffered great pain of body and mind, and incurred reasonable and necessary medical expenses for subsequent medical care and treatment.

WHEREFORE, Plaintiff, Ramona Santiago, demands judgment against the Defendant, Family Dollar Stores of Massachusetts, LLC. for damages plus interest and costs of this action.

**PLAINTIFF DEMANDS A TRIAL BY JURY!**

Respectfully submitted,  
Plaintiff,  
By Her Attorney,

\_\_\_\_\_  
Richard A. Lalime  
B.B.O. #: 283620  
[lalimelaw@aol.com](mailto:lalimelaw@aol.com)  
Law Offices of Richard A. Lalime  
144 Merrimack Street, Suite 444  
Lowell, Massachusetts 01852  
(978) 452-4600

Date: \_\_\_\_\_

CIVIL ACTION COVER SHEET		DOCKET NUMBER	Trial Court of Massachusetts The Superior Court	
PLAINTIFF(S):	RAMONA SANTIAGO	COUNTY Middlesex		
ADDRESS	927 Dekalb Avenue Brooklyn, New York 11221	DEFENDANT(S): FAMILY DOLLAR STORES OF MASSACHUSETTS, LLC.		
ATTORNEY:	Richard A. Lalime, Esq.	ADDRESS: 500 Volvo Parkway Chesapeake, Virginia 23320		
ADDRESS:	Law Offices of Richard A. Lalime 144 Merrimack Street, STE 444 Lowell, Massachusetts 01852	EBO 283620		
TYPE OF ACTION AND TRACK DESIGNATION (see reverse side)				
CODE NO. B20	TYPE OF ACTION (specify) Personal Injury - Slip and Fall	TRACK F	HAS A JURY CLAIM BEEN MADE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
*If "Other" please describe:				
STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A				
The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff counsel relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.				
<u>TORT CLAIMS</u> (attach additional sheets as necessary)				
A. Documented medical expenses to date:				
1. Total hospital expenses		\$		63,477.50
2. Total doctor expenses		\$		23,296.00
3. Total chiropractic expenses		\$		15,798.14
4. Total physical therapy expenses		\$		
5. Total other expenses (describe below)		\$		
AMBULANCE, X-RAYS, MRIs, HOME HEALTH AIDE				Subtotal (A): \$
B. Documented lost wages and compensation to date				\$
C. Documented property damages to date				\$
D. Reasonably anticipated future medical and hospital expenses				\$
E. Reasonably anticipated lost wages				\$
F. Other documented items of damages (describe below)				\$
G. Briefly describe plaintiff's injury, including the nature and extent of injury: Plaintiff sustained injuries to her left knee, right elbow, left ankle - requiring walking boot, neck and right shoulder - requiring reversed shoulder replacement.				TOTAL (A-F): \$
				225,359.06
<u>CONTRACT CLAIMS</u> (attach additional sheets as necessary)				
Provide a detailed description of claim(s):				
				TOTAL: \$
Signature of Attorney/Pro Se Plaintiff: X				Date:
RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.				
CERTIFICATION PURSUANT TO SJC RULE 1:18				
I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.				
Signature of Attorney of Record: X				Date:

**CIVIL TRACKING ORDER**  
(STANDING ORDER 1- 88)

DOCKET NUMBER

1781CV01529

**Trial Court of Massachusetts**  
**The Superior Court**

## CASE NAME

Ramona Santiago vs. Family Dollar Stores Of Massachusetts, LLC

Michael A. Sullivan, Clerk of Court  
Middlesex CountyTO: Richard A Lalime, Esq.  
Law Offices of Richard A. Lalime  
144 Merrimack St  
Suite 444  
Lowell, MA 01852COURT NAME & ADDRESS  
Middlesex Superior - Lowell  
360 Gorham Street  
Lowell, MA 01852**TRACKING ORDER - F - Fast Track**

You are hereby notified that this case is on the track referenced above as per Superior Court Standing Order 1-88. The order requires that the various stages of litigation described below must be completed not later than the deadlines indicated.

**STAGES OF LITIGATION****DEADLINE**

	SERVED BY	FILED BY	HEARD BY
Service of process made and return filed with the Court		08/17/2017	
Response to the complaint filed (also see MRCP 12)		09/18/2017	
All motions under MRCP 12, 19, and 20	09/18/2017	10/16/2017	11/15/2017
All motions under MRCP 15	09/18/2017	10/16/2017	11/15/2017
All discovery requests and depositions served and non-expert depositions completed	03/15/2018		
All motions under MRCP 56	04/17/2018	05/14/2018	
Final pre-trial conference held and/or firm trial date set			09/11/2018
Case shall be resolved and judgment shall issue by			05/20/2019

The final pre-trial deadline is not the scheduled date of the conference. You will be notified of that date at a later time. Counsel for plaintiff must serve this tracking order on defendant before the deadline for filing return of service. This case is assigned to

DATE ISSUED

05/19/2017

ASSISTANT CLERK

Michael M Brennan

PHONE

(978)453-0201

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED: —  
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EQUITABLE RELIEF — OTHER

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Richard A. Lalime ..... plaintiff's attorney, whose address is 144 Merrimack Street  
STE 444, Lowell, MA 01852

....., an answer to the complaint which is herewith  
served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you  
fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also  
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claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esquire, at ..... Lowell .....  
the ..... 19th ..... day of ..... MAY .....  
....., in the year of our Lord ..... two thousand seventeen .....

*[Signature]*  
Clerk

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( ..... 20..... )  
( ..... )

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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX ....., ss.

SUPERIOR COURT  
DEPARTMENT  
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(Mass. R. Civ. P. 4)